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ARROW GEAR COMPANY

2301 Curtiss Street • Downers Grove, Illinois 60515
Phones: Area Code 312 969-7640 • 242-2952

November 16, 1983

Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

ATTN: Yogesh Shech

RE: NPDES PERMIT #IL 0038016

Dear Sir:

Per your inquiry, we are enclosing a letter from our laboratory, Enviro-Test, Inc., interpreting the findings in their Certified Laboratory Report D7731 which was submitted with our application for NPDES Permit Renewal.

We will appreciate at your earliest convenience a corrected copy of Public Notice #sd/sp/8197C requested in our letter of October 26, 1983 (see copy attached).

Very truly yours,

ARROW GEAR COMPANY

James J. Cervinka
James J. Cervinka
Chairman of the Board

JJC:oj

Enc.





ENVIRO-TEST, INC.

(312) 963-4672

319 Ogden Avenue • Downers Grove, Illinois 60515

November 9, 1983

Arrow Gear Company
2301 Curtiss St.
Downers Grove, IL 60515

RE: Report #D7731

Attention: Ms. Olga Jungkans

The results listed for BOD and COD in the above certified laboratory report (27 & 37 mg/l, res.) do not in any way indicate the presence or absence of oil and grease (FOG) in the sample. Only a direct assay for oil and grease (FOG) can establish and measure this parameter.

As an example of this, water containing a quantity of ethanol can have a significant BOD and COD (in the hundreds or even thousands) but the FOG will be zero!

It is the opinion of this laboratory that incorrect and invalid conclusions are being drawn from certain data not meant for this purpose.

Respectfully submitted,

R. J. Jakubiec, PhD.
Laboratory Director

RJJ:rv

Member of:

American Society for Testing and Materials
American Chemical Society
American Oil Chemists Society
American Chemical Society-Analytical Division
Water Pollution Control Federation